

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California public
benefit corporation; LAURA CHAMBERS and
her marital community; WINIFRED MITCHELL
BAKER and her marital community, and DANI
CHEHAK and her marital community.

Defendants.

Case No. 2:24-cv-1032

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
RESPOND TO COMPLAINT**

**NOTE ON MOTION CALENDAR:
July 19, 2024**

STIPULATION

Plaintiff STEVE TEIXEIRA (“Plaintiff”) and Defendants MOZILLA CORPORATION a.k.a M.F. Technologies (“Mozilla”), MOZILLA FOUNDATION (“Mozilla Foundation”), LAURA CHAMBERS, WINIFRED MITCHELL BAKER, DANI CHEHAK (the “Individual Defendants”) (collectively “Defendants”), on the other, by and through their respective counsel of record, submit the following stipulation with reference to the following facts:

1. Plaintiff initiated this action in the Washington Superior Court for King County, where he filed his Complaint against Defendants on June 12, 2024.

2. Following service of the Complaint on Mozilla, with the consent of all Defendants, Mozilla removed the action to this Court on July 12, 2024.

3. Pursuant to FRCP 81(c)(2)(C), the current deadlines for Mozilla and

1 Mozilla Foundation to respond is July 19, 2024.

2 4. Attorneys for Defendants Laura Chambers, Winifred Mitchell Baker, and
3 Dani Chehak hereby accept and acknowledge service of the Summons, Complaint, Case
4 Information Cover Sheet, and Case Schedule as of July 17, 2024. Pursuant to FRCP 81(c)(2)(C),
5 the current deadline for the Individual Defendants to respond is August 7, 2024.

6 5. To allow the parties the chance to review and address Plaintiff's allegations
7 and allow the parties to be on the same schedule, Defendants have requested, and Plaintiff has
8 agreed, to an extension of time that would allow each of the Defendants to respond to the
9 Complaint on or before August 16, 2024.

10 6. No other extensions of time have been requested or granted, and the parties
11 do not anticipate that this short extension will materially delay the proceedings or result in
12 prejudice to any party.

13 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED, that the deadline
14 for Defendants to file their respective responses to the Complaint shall be August 16, 2024.

1 Dated this 19th day of July, 2024.

2 STOKES LAWRENCE, P.S.

3 s/ Mathew L. Harrington

4 Mathew L. Harrington

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CORPORATION a.k.a M.F.

TECHNOLOGIES, LAURA CHAMBERS,

WINIFRED MITCHELL BAKER, and

DANI CHEHAK

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Attorney for Defendant Mozilla Foundation

ORDER

In accordance with the foregoing stipulation, and good cause appearing therefore, it is so ORDERED.

Dated this ____ day of July, 2024.

United States District Judge
Judge Richard A. Jones

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties or their counsel of record.

Dated this 19th day of July, 2024

s/ Jacey Bittle
Jacey Bittle, Legal Administrative Assistant